

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

DAVID SAMBRANO, individually and on  
behalf of all others similarly situated, *et al.*,

*Plaintiffs,*

v.

UNITED AIRLINES, INC.,

*Defendant.*

Civil Action No.: 4:21-cv-01074-P

**PLAINTIFFS' MOTION TO LIFT STAY AND FOR  
ENTRY OF PARTIAL FINAL JUDGMENT**

Pursuant to Local Rule 7.1 and Federal Rule of Civil Procedure 54(b), Plaintiffs respectfully request that the Court temporarily lift the current stay that is in place for this matter and enter partial final judgment for all claims dismissed in the Court's December 18, 2023 Opinion & Order. ECF No. 231. As set forth in the accompanying memorandum, granting this motion and permitting an immediate appeal of that order will conserve resources and promote the interests of sound judicial administration.

September 19, 2024

Respectfully submitted,

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### **CERTIFICATE OF CONFERENCE**

Counsel for Plaintiffs conferred with counsel for United about the relief requested in this motion. Counsel for United stated that United opposes the motion for entry of partial final judgment. United does not oppose a partial modification of the stay to the extent necessary to facilitate consideration of that motion.

/s/ Brian J. Field  
Brian J. Field

### **CERTIFICATE OF SERVICE**

On September 19, 2024, I filed the foregoing document with the clerk of court for the United States District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) (ECF System).

/s/ Brian J. Field  
Brian J. Field